

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DESIREE HOLLIS,	)	
	)	Case No. 21 C 1956
Plaintiff,	)	
	)	Judge: Hon. Thomas Durkin
v.	)	
	)	Mag. Judge: Hon. Jeffrey Cole
THE CITY OF CHICAGO and CHICAGO	)	
POLICE OFFICER ROY BOFFO,	)	
(#UNKNOWN),	)	
	)	
Defendants.	)	

**JOINT MOTION TO STRIKE  
DISCOVERY DEADLINE AND TO STAY DISCOVERY**

Plaintiff, Desiree Hollis, by and through one of her attorneys, Daniel Massoglia, and Defendants Roy Boffo, (hereinafter “Sergeant Boffo”), and the City of Chicago, (collectively “Defendants”), by and through one of their attorneys, Emily R. Bammel, Assistant Corporation Counsel, respectfully request this Honorable Court to strike the current fact discovery deadline and stay discovery. In support of their motion, the parties state as follows:

1. On August 9, 2021, this Honorable Court ordered fact / liability discovery to be completed by March 19, 2021. ECF Dkt. No. 26. The parties exchanged Rule 26(a) disclosures that month.
2. Subsequent to Plaintiff’s filing of her Second Amended Complaint naming Sergeant Boffo as an individual Defendant, the Defendants filed a motion to dismiss (“Motion”) the matter in its entirety. ECF Dkt. No. 35. Briefing by the parties regarding the Motion was completed by December 22, 2021. *See* ECF Dkt. Nos. 36-38.
3. On October 27, 2021, counsel for Plaintiff contacted counsel of record for Defendants proposing a stay of discovery pending resolution of Defendants’ Motion, to which the Defendants had no objection. Plaintiff, inadvertently, never filed a motion outlining this agreement and requesting that the court stay discovery during the pendency of the Motion.

4. On March 15, 2022, the undersigned counsel for Defendants contacted Plaintiff's counsel via email correspondence regarding the contents of the instant motion, to which Plaintiff relayed no objection and agreed to file jointly.
5. Striking the current fact discovery deadline of March 19, 2022, and further staying discovery until this Honorable Court's ruling on the Defendants' Motion to dismiss, would not prejudice any party and would serve the interests of judicial economy. The request is made in good faith and by the agreement of the parties.

WHEREFORE, the parties respectfully request this Honorable Court grants their joint motion to strike the current fact discovery deadline set for March 19, 2022, and further stay discovery pending the resolution of the Defendants' Motion to Dismiss, and any other relief this Court deems fair and just.

Respectfully submitted,

/s/ Emily R. Bammel  
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***One of Plaintiff's Attorneys***